

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

THIS DOCUMENT RELATES TO:

TRACK THREE

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**MOTION TO PRECLUDE TESTIMONY FROM PLAINTIFFS' FACT WITNESSES  
ABOUT PRESCRIPTION OPIOIDS BEING A "GATEWAY" TO OTHER DRUG USE**

**EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
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IN RE: NATIONAL PRESCRIPTION )  
OPIATE LITIGATION )  
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Track Three Cases )

VIDEOTAPED RULE 30(b)(6) DEPOSITION OF  
APRIL J. CARAWAY  
Conducted via Zoom  
Warren, Ohio  
Thursday, March 4th, 2021

REPORTED BY: GREG S. WEILAND, CSR, RMR, CRR  
JOB NO.: 4477980

1           agencies, and they talk about in the rooms in  
2           the 12-step meetings. They started out on pain  
3           meds.

4       BY MR. BROWN:

5           Q.    Do you also hear stories about individuals  
6           who obtained prescription opioids in an unauthorized  
7           way, not as a result of a valid prescription for  
8           that individual, who later became addicted to  
9           prescription opioids and illicit opioids?

10          A.    Yes, we've heard stories from young people  
11          where they said they first tried it taking it out of  
12          their mom's purse or their grandma's medicine  
13          cabinet or something like that, that it was somebody  
14          else's prescription opioid that they took.

15          Q.    Are you aware of any studies regarding the  
16          percentage of illicit opioid users who began their  
17          drug abuse with prescription opioids?

18          A.    Yes, there's studies that have been done  
19          by the CDC, by NIDA, by SAMHSA, and that number of  
20          70 percent is consistent in those reports. We were  
21          shared that at state meetings. There have been  
22          studies about that.

23          Q.    And when -- you mentioned CDC, you  
24          mentioned NIDA.

25                   What is the other study?

1           A.    I didn't speak with her about that because  
2   we don't have a percentage. I spoke with her about  
3   the OSAM reports, some of which her name is on. And  
4   those were a sample size of people in the Mahoning  
5   Valley, where they talked to them about, how did you  
6   get started, you know, into drugs. And she said the  
7   majority said prescription opioids, and then it's  
8   written in some of the reports.

9           Q.    I'm sorry, I thought you did give me a  
10  percentage of the number of people who started with  
11  prescription opioids who then used illicit opioids.

12                   Did I misunderstand you?

13           A.    It would be upwards of 70 percent. I'm  
14  sorry, I thought you said a number.

15           Q.    Perhaps I did. But you say it's  
16  70 percent?

17           A.    Yes, that's what the research indicates.

18           Q.    You personally have not conducted any  
19  studies on whether prescription opioid use leads to  
20  illicit opioid abuse, correct?

21           A.    Correct.

22           Q.    And the studies --

23           A.    I take a lot of phone calls from people  
24  who tell me that. So, I mean, I'm not an  
25  epidemiologist doing a study, but I've heard

1 firsthand for years and years.

2 I don't remember ever getting a phone  
3 call -- and I'm telling you, I get these phone calls  
4 weekends, nights, you know, in 2017 daily, people  
5 seeking help and treatment.

6 I don't ever remember, you know, someone  
7 indicating they needed help for their  
8 methamphetamine abuse or for anything else. What  
9 they were calling about was their opiate use, and  
10 what they consistently told me was they started out  
11 on prescription opioids.

12 Q. Do you know what percentage of illicit  
13 opioid abusers began with polysubstance abuse?

14 MR. BADALA: Objection to form.

15 THE WITNESS: No, but we know -- the  
16 County knows that polysubstance abuse happens  
17 after the fact. They start on prescription  
18 opioids. They get addicted to the opioid.  
19 Then they move on to other things.

20 Because the overdoses were so great in  
21 2017, especially. That's when the tsunami hit,  
22 and we were trying to react. We didn't have  
23 detox beds available for the people who needed  
24 them. We were buying them from everywhere.

25 And people then -- started, you know,

1 the scope of the topics.

2 MR. CARTER: And I'll just state for the  
3 record, it's Topic 8.

4 BY MR. CARTER:

5 Q. Go ahead.

6 A. The County would rely on that.

7 Q. All right. Switching topics, you talked  
8 about the County's position that the use of illicit  
9 prescriptions has led to the use of street drugs.  
10 That's what I want to follow up on.

11 Putting prescription opioids aside, are  
12 there other gateways to substance abuse?

13 MR. BADALA: Objection to form, outside  
14 the scope.

15 THE WITNESS: We do, you know, prevention  
16 with kids. And a lot of the evidence-based  
17 program, they talk about certain gateways that  
18 can lead to other drugs. So we talk to kids  
19 about the dangers of alcohol, marijuana,  
20 smoking cigarettes.

21 But, you know, it's -- those aren't a  
22 gateway to this opiate epidemic. The opioids  
23 are a gateway to the heroin and to the fentanyl  
24 and to this opiate epidemic.

25